

District Judge James L. Robart

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

JULIO CURY, *et al.*,

Civil Action No.: 2:23-cv-00499-JLR

Plaintiffs,

V.

STIPULATION FOR AN EXTENSION OF TIME

DEPARTMENT OF STATE, *et al.*,

Defendants.

Noted for Consideration:
November 8, 2024

* * * * *

Because of numerous recent developments in other matters beyond the control of Plaintiffs' counsel, Plaintiffs' counsel requested that the parties stipulate to an extension for Plaintiffs file their opposition and commensurate extensions on the remaining deadlines. Plaintiffs' counsel represents that he faces a significant workload for the remainder of November and originally proposed filing Plaintiffs' opposition on 3 December 2024.

Defendants are generally amenable to agreeing to Plaintiffs' request for an extension, however, the deadline proposed by Plaintiffs poses scheduling conflicts for Defendants. It would require Defendants to prepare their opposition and reply during a period when defense counsel has conflicts and/or is not available for part of the time. Defense counsel indicated that they

would agree to stipulate to an extension for Plaintiffs until November 27, 2024, but Plaintiffs' counsel indicates that this schedule would not work for Plaintiffs.

Therefore, in order to accommodate Plaintiffs' request for an extension, and not result in creating a conflict for Defendants, the parties stipulate to and propose the following schedule:

1. Plaintiffs will file their opposition and cross-motion, if any, on or before January 3, 2025;
2. Defendants will file their reply and opposition to any cross-motion on or before January 24, 2025; and
3. Plaintiffs will file their reply in support of any cross-motion on or before February 7, 2025.

Date: November 8, 2024

Respectfully submitted,

NATIONAL SECURITY COUNSELORS

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/s/ Kelly B. McClanahan

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Counsel for Plaintiffs

Counsel for Defendants

I certify that this memorandum contains 219 words, in compliance with the Local Civil Rules.

[PROPOSED] ORDER

It is so ORDERED.

Dated this _____ day of _____, 2024.

JAMES L. ROBART
United States District Judge